

**CONTINUATION IN SUPPORT OF APPLICATION FOR ARREST
WARRANT**

I, Benjamin Glynn, being duly sworn, depose and state as follows:

Introduction

1. This continuation is submitted for the purpose of obtaining an arrest warrant for LACOREY WEAVER for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

2. I am an agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since January 2017. I am currently assigned to the FBI Detroit Field Office, St Joseph Resident Agency. Prior to becoming an agent, I was a police officer and detective with the Rock Hill (SC) Police Department for six years. As both an agent and detective, I have spent most of my time investigating drug and gun violations and the criminal networks responsible for those violations. As a police officer, I was a member of the Street Crimes Unit for two years, during which time my focus was on interdicting violent actors in my city responsible for a large percentage of the violent shooting incidents and drug distribution. I also spent two years as a police officer with the Violent Crime Unit, which conducted long-term investigations into the national street gangs and neighborhood-based gangs which were responsible for much of the gun and drug violations. Since becoming a federal agent, I have been a member of the FBI Benton Harbor Safe Streets Task Force; I have led that Task Force for the past five years. During my time with the Task Force, I have had a similar focus on combating the drug-trafficking organizations and violent neighborhood-based gangs prevalent in the Benton Harbor community.

3. The facts in this Continuation come from my personal observations, training, experience, and from information obtained from other witnesses. This Continuation is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter.

Probable Cause

Shooting Incident on February 12, 2024

4. On February 12, 2024, Benton Harbor Department of Public Safety officers responded to a shooting incident at the Cogic Village apartment complex located in the 1900 block of Territorial Road in Benton Harbor, MI. The victim, Josh Hutchinson, was shot multiple times. Law enforcement officers responding to the shooting scene observed a purple Dodge Charger traveling away from the area of the scene. The Charger failed to yield to emergency vehicles and was traveling at a high rate of speed. Investigators used a law enforcement resource and identified a purple Dodge Charger bearing Oklahoma license plate KET205 that was at the intersection of Britain Avenue and Crystal Avenue minutes after the shooting.¹ The Charger was rented by Lontia Burrell.

5. This same Charger was captured on surveillance footage entering the Cogic Village apartment complex minutes before the shooting took place and exiting the apartment complex around the time of the shooting. Following the shooting, the Charger was also captured on surveillance camera traveling eastbound on Napier

¹ The time to travel from the shooting scene to that intersection is approximately 3 to 4 minutes.

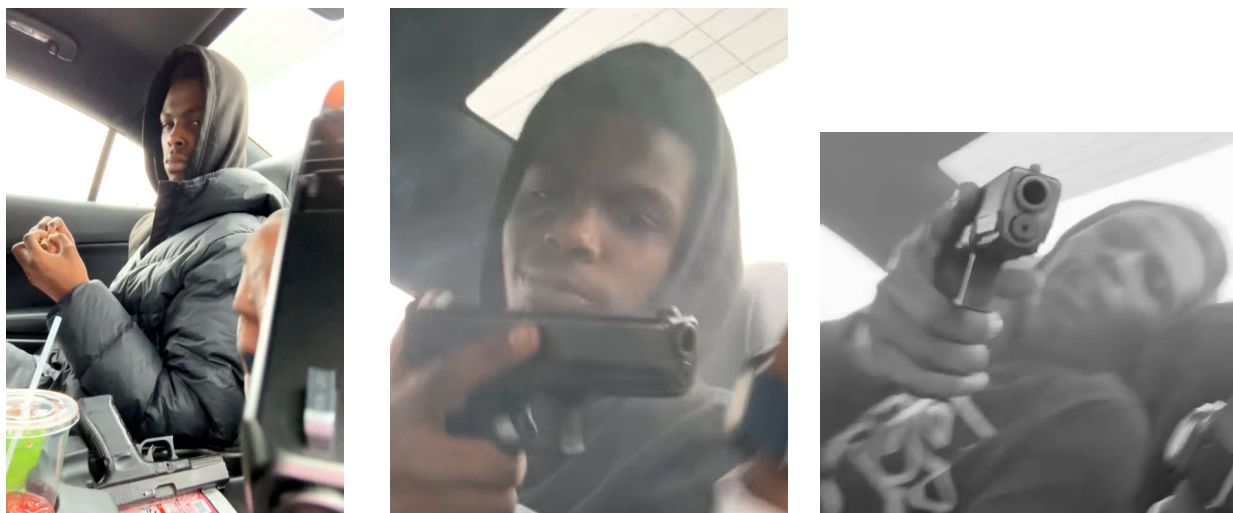
Avenue toward I-94. Approximately 41 minutes later, the Charger was identified once again by a law enforcement resource in the city of Kalamazoo. Kalamazoo is approximately 40 minutes away from Benton Harbor via I-94.

6. Investigators located surveillance footage from a Benton Harbor convenience store from approximately two hours before the shooting in which Burrell and three other persons were in the Charger. Investigators learned that, later in the day on February 12, Burrell returned the Dodge Charger to Enterprise in exchange for a Buick Envision bearing South Carolina license plate WJZ768.

7. On the following day, February 13, Berrien County Deputies recovered a Glock Model 22 Gen 4 handgun with an extended magazine from the side of the road on the eastbound ramp from Napier Avenue to I-94. Based on the above information, the location of the recovered firearm was believed to be along the path of travel of the Charger following the shooting. This firearm was test-fired and the casings were compared to those collected from the scene of the shooting. The casings from the scene were confirmed to have been fired from the recovered Glock Gen 4 handgun.

8. Three days later, on February 15, investigators located the Buick Envision at 1074 Harbor Court in Benton Harbor, MI. Investigators served a State of Michigan search warrant at that location and seized, among other items, Burrell's cell phone and a stolen Glock Model 22 Gen 5 handgun with a Modular Optic System ("MOS") plate.

9. Investigators searched Burrell's phone pursuant to another State of Michigan search warrant and observed videos taken by Burrell of himself and WEAVER with two Glock handguns. The firearm possessed by Burrell appeared to match the Glock Model 22 Gen 5 handgun with the MOS plate; the firearm possessed by WEAVER appeared to match the Glock Model 22 Gen 4 handgun, retrieved from the Napier Ave/I-94 ramp and ballistically linked to the shooting. Below are multiple screen-captures from the videos depicting WEAVER possessing the Glock Model 22 Gen 4:



10. The metadata associated with the videos revealed they were created on February 10, 2024, in Van Buren County, which is located in the Western District of Michigan.

11. In April 2023, WEAVER was convicted of carrying a concealed weapon, a felony offense which prohibits him from possessing a firearm.²

² WEAVER was designated an adult and was convicted, as an adult, in Case No. 2023-0065-DJ-G on April 28, 2023.

12. Based on the totality of the investigation, a state arrest warrant was issued for WEAVER from the Van Buren County Prosecutor's Office for possessing a firearm as a convicted felon.

13. On April 5, 2024, investigators located and arrested WEAVER at his residence of 2088 Empire Avenue, Lot 66, in Benton Harbor. Following his arrest, WEAVER was advised of his *Miranda* rights; WEAVER agreed to speak with investigators. WEAVER recalled that when the video was created on February 10, 2024, two Glock handguns were present in the Charger, one a Gen 4 and one a Gen 5. WEAVER handled the Gen 4 and Burrell the Gen 5. WEAVER also acknowledged that, on the day of the shooting, he once again handled the Gen 4 while inside the Charger with Burrell, Brian Gillespie, and a juvenile. However, WEAVER denied that he was present inside the Charger when Hutchinson was shot. He said that while he handled the Gen 4 the day of the shooting and his DNA would be on the trigger, he left the gun in the Charger when he was dropped off prior to the shooting.

14. The Bureau of Alcohol, Tobacco, and Firearms ("ATF") has made a preliminary determination that the Glock Model 22 Gen 4 handgun was manufactured outside the State of Michigan, as are all Glock firearms.

Conclusion

15. Based on the facts described above, I believe there is probable cause that LACOREY WEAVER violated Title 18, United States Code, Section 922(g)(1), felon in possession of a firearm.